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**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

WILLIAM F. DAVIS, III)	
)	
Plaintiff,)	C.A. No. 04-209-SLR
)	
v.)	
)	
CORRECTIONAL MEDICAL)	JURY OF TWELVE DEMANDED
SYSTEMS, FIRST CORRECTIONAL)	
MEDICAL, and the DEPT. OF)	
CORRECTION,)	
)	
Defendants.)	

FIRST CORRECTIONAL MEDICAL’S MOTION TO SEAL

First Correctional Medical, hereinafter “FCM”, moves the Court for a protective order sealing the addresses of its former employees. In support of its motion, FCM offers the following:

1. Pursuant to D.I. 42, this Court requested that FCM provide the last known addresses of the following individuals:

Dr. Robinson
Nurse Betty Doe

2. These individuals have worked, and may continue to work, in the Delaware Prison System. Due to the sensitive nature of their employment and the population they serve/served, FCM requests, for both the protection and privacy of their former employees, that their personal information be kept under seal.

3. In order to comply with D.I. 42, FCM has filed the requested addresses as Exhibit A under seal and prays that this Court will see that service as to these individuals is handled by the Federal Marshal Service without the plaintiff gaining access to the private information of FCM’s former employees.

4. For the above mentioned reasons, FCM requests that this Court seal the addresses of FCM's former employees.

MCCULLOUGH & MCKENTY, P.A.

/s/ Dana Spring Monzo

Daniel L. McKenty, Del. Bar #2689

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Attorneys for First Correctional Medical

Dated: June 14, 2006

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

WILLIAM F. DAVIS, III)	
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Plaintiff,)	C.A. No. 04-209-SLR
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MEDICAL, and the DEPT. OF)	
CORRECTION,)	
)	
Defendants.)	

ORDER

AND NOW, the Court having considered First Correctional Medical's Motion to Seal, and it appearing that the motion is brought in good faith,

IT IS HEREBY ORDERED this _____ day of _____, 2006, that the addresses of First Correctional Medical's former employees be sealed.

J.

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FIRST CORRECTIONAL MEDICAL'S MOTION TO SEAL - EXHIBIT A

**CONFIDENTIAL - FILED UNDER SEAL
SUBJECT TO A PROTECTIVE ORDER**

MCCULLOUGH & MCKENTY, P.A.

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Defendants.)	

CERTIFICATE OF SERVICE

I, **DANA SPRING MONZO**, hereby certify that on this date, **First Correctional Medical's**

Motion to Seal was served, via first class mail, upon the following:

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